REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested. Claims 1-9, 11, 13, 15, 18-21, 26, 28 and 30-43 remain pending.

Claims 1-9, 11, 13, 15, 18-21, 26-28 and 31-42 are rejected under 35 U.S.C. § 102(b) as being anticipated by published patent application GB 2045938 A to Davis, of record. Claims 30 and 43 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Richter, of record. These rejection are respectfully traversed.

Specifically, Applicants respectfully submit that the "error correction" of the claimed embodiments of the present invention relates to errors in the outputs from the motion sensors that can occur because motion sensors tend to drift with respect to, for example, changes in temperature. The Examiner contends in the "Response to Arguments" section of the Final Office Action that the motion damping allegedly taught by Davis is a form of error correction. However, Applicants respectfully submit that assuming, *arguendo*, that motion damping is to be equated with error correction, such motion damping corrects for the actual motion of the probe, and not for errors in the output of the motion sensors. Hence, in the Davis arrangement, if there is an error in the output of the motion sensors, no amount of motion damping will improve the output of the motion sensors or correct for any error in the output of the motion sensors.

Again, Applicants respectfully note that the independent claims of the present application recite that the processor is adapted to determine an error correction. On the other hand, even if the motion damping is interpreted to be an "error correction" component, which Applicants respectfully

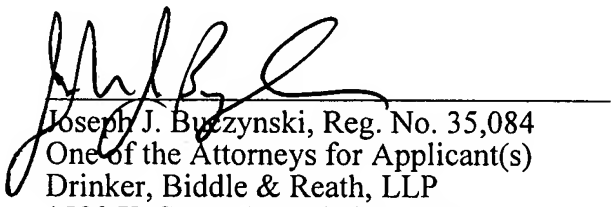
dispute, the motion damping in the Davis apparatus is performed by an articulated arm structure and not a processor (see page 2, line 118 of Davis).

These differences can be further appreciated from the dependent claims. For example, dependent claim 9 more explicitly recites differences between the error correction of the claimed embodiments of the present invention and the motion damping taught by Davis. That is, claim 9 recites that the processor is adapted to determine an error correction. However, as discussed above, an articulated arm, not the probe's processor, provides for motion damping in Davis. Claim 9 further recites that the processor determines an error correction in relation to motion detected by the one or more motion sensors when the probe is substantially stationary. Hence, according to this claimed embodiment, when the probe is stationary at a point but the output of the motion sensors indicate that motion is being detected, the processor determines this to be an error in the output of the motion sensors for which correction is to be performed. On the other hand, in Davis, there can be no error correction when the probe is substantially stationary because the articulated arm can only damp motion, and when there is no motion, there is no damping.

For at least these reasons, Applicants respectfully submit that the teachings of Davis fail to anticipate the embodiments of the present invention even as defined in independent claims 1, 5 and 6. Hence, all claims should be allowable. Applicants further submit that as discussed in the Remarks of the previous Amendment, Richter fails to teach or suggest any error correction determined by a processor as recited even in amended independent claims 1, 5 and 6. Therefore, Applicants respectfully submit that the teachings of Richter fail to make up for the deficiencies in the teachings of Davis. Accordingly, all claims should be allowable over these references.

In view of the above, it is believed that the application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Respectfully submitted,



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